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July 28, 2005

Via FedEx  
Marlene H. Dortch  
Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Docket 05-196, Subscriber Notification report

Dear Secretary Dortch:

This letter is in compliance with the Enforcement Bureau's requirements in Docket 05-196 concerning interconnected voice over Internet protocol providers ("VoIP"). CommPartners is an interconnected VoIP provider headquartered in Las Vegas, Nevada. CommPartners is currently a wholesale-only provider of VoIP services. As such, CommPartners does not specifically provide VoIP to end user customers. Instead, CommPartners sells its services on a wholesale basis to "partners," including wireless Internet service providers and network integrators. CommPartners currently has 45 wholesale customers in service as of the date of this filing.

CommPartners has received positive acknowledgement of the limitations of its 911 emergency services from 100% of these 45 customers. CommPartners specifically advises every new and existing wholesale customer, prominently and in plain language, of the circumstances under which E911 service may not be available through CommPartners' VoIP service. CommPartners also provides clear and explicit information regarding the differences between CommPartners' 911 emergency services and traditional E911 service.

CommPartners remains in constant contact with its wholesale partners in providing updated 911 information. Because CommPartners is a wholesaler, however, the company has no control over whether its customers provide 911 information to the ultimate end users. CommPartners has urged its partners to cooperate with FCC requirements including filing these status reports to the Commission. CommPartners believes that it is beyond the scope of the Commission's ruling to ensure that its wholesale customers provide the requested information to end users, or status reports to the Commission.

When obtaining service from CommPartners, these wholesale customers provide an affirmative acknowledgement of CommPartners 911 limitations. This is provided both electronically on sign-up pages, as well as in the wholesale contract signed by the customer. CommPartners maintains copies of these acknowledgments in the normal course of its business.

To the extent that wholesale customers buy customer premise equipment ("CPE") from CommPartners, all CommPartners-provided equipment comes with warning stickers that end users must remove before being able to use the equipment. If the partner is providing its own CPE, or if the end user already has VoIP CPE, then CommPartners is unable to guarantee that the CPE has the required warnings. To be clear, all CommPartners-issued equipment has such warning labels in place. Moreover, wholesale partners have been advised of this FCC requirement and warning labels have been made available to these partners at no charge.

CommPartners has every intention of complying with existing and future Commission rules regarding VoIP providers. If any further information is required regarding this filing or any future issues, please contact CommPartners' Regulatory Counsel, Kristopher Twomey, by phone at 702 367-8647, by email at [ktwomey@commpartners.us](mailto:ktwomey@commpartners.us), or by mail at 3291 North Buffalo Drive, Suite 3, Las Vegas, Nevada 89129.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kristopher Twomey", with a stylized, flowing script.

Kristopher E. Twomey  
Regulatory Counsel

cc: Best Copy & Printing